

CORRES. CONTROL  
INCOMING LTR NO.

00666 RF02

DUE DATE  
ACTION

Department of Energy

ROCKY FLATS FIELD OFFICE  
10808 HIGHWAY 93, UNIT A  
GOLDEN, COLORADO 80403-8200

SEP 30 2002

RECEIVED

2002 OCT -1 P 2:45

CORRESPONDENCE  
CONTROL

02-DOE-01349

DIST.	LTR	ENC
BOGENBERGER, V.		
BOGNAR, E.	X	X
DECK, C.A.	X	X
DEGENHART, K.		
DIETER, T.J.		
DIETERLE, S.E.		
FERRERA, D.W.	X	X
FERRI, M.S.		
GERMAIN, A.L.		
GIACOMINI, J.J.		
ISOM, J.H.		
LINDSAY, D.C.	X	X
LONG, J.W.		
MARTINEZ, L.A.	X	X
NAGEL, R.E.	X	X
NORTH, K.	X	X
PARKER, A.M.	X	X
POWERS, K.		
RODGERS, A.D.		
SHELTON, D.C.	X	X
SPEARS, M.S.		
TRICE, K.D.		
TUOR, N.R.	X	X
VOORHEIS, G.M.		
WILLIAMS, J.L.		
GIBBS, F.	X	X
STEWART, B.	X	X
Foss, D.	X	X
BROOKS, L.	X	X
BUTLER, L.	X	X

Mr. Steven H. Gunderson

Rocky Flats Cleanup Agreement Project Coordinator

Colorado Department of Public Health and Environment

4300 Cherry Creek Drive South

Denver, CO 80222-1530

Dear Mr. Gunderson:

In accordance with the Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Component Removal, Size Reduction and Decontamination Activities, this letter and its enclosures is notification for RSOP implementation. This letter notifies the Colorado Department of Public Health and Environment of the removal of contaminated portions of Building 910 before the demolition of the facility. Once the pre-demolition survey is complete and the facility meets free release requirements, an additional notice will be provided.

The appropriate checklists and information required by the RSOP are enclosed with this letter and should provide the necessary information. This work will be conducted in accordance with the work control documentation prepared by Kaiser-Hill Company, L.L.C. Construction or the designated subcontractor. The exact methods and process selected will be communicated to the Department of Energy/Lead Regulatory Agency through the consultative process, particularly the weekly Area 2 status meeting. Questions can be directed to Mr. Steve Tower at (303) 966-2133.

Sincerely,

Joseph A. Legare

Assistant Manager

for Environment and Stewardship

Enclosure

cc w/o Enc:

S. Tower, AMP, RFFO

F. Gibbs, K-H RISS D&amp;D

B. Stewart, K-H RISS D&amp;D

D. Foss, K-H RISS D&amp;D

T. Rehder, EPA

cc w/Enc:

Building 850 Administrative Record

Reviewed for Addressee  
Corres. Control RFP10/1/02 *leg*  
Date By

Ref. Ltr. #

DOE ORDER #



ADMIN RECORD

IA-A-001097

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## RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist

<b>Project scope:</b> Building 910 component removal, size reduction, and decontamination			
<b>Facility description:</b> Building 910 – liquid treatment systems building.			
<b>Description of planned activity(ies):</b> The decontamination, size reduction, and component removal required to bring Buildings 910 to the unrestricted release criteria.			
<b>Facility/rooms/sets/areas involved:</b> Building 910, entire facility			
<b>Is RCRA unit closure(s) part of the planned activity?</b>			<input type="checkbox"/> Yes
<b>If RCRA units are included, attach unit specific information sheets and drawings. (See additional information attached.)</b>			<input checked="" type="checkbox"/> No
<b>Attach checklists from Appendix A of the RSOP.</b>		<input checked="" type="checkbox"/>	<b>Component Removal/Size Reduction</b>
		<input checked="" type="checkbox"/>	<b>Decontamination</b>
<b>RLCR Status</b>	<input checked="" type="checkbox"/>	<b>RLCR complete and concurrence received: May 12, 2000</b>	
	<input type="checkbox"/>	<b>RLCR initiated but incomplete; concurrence anticipated:</b>	
	<input type="checkbox"/>	<b>RLC has not been initiated<sup>1</sup> and is scheduled for initiation on:</b>	
<b>If RLCR is not complete or initiated, what data will be used to plan the work activities?</b>			
<b>Activity requires modification to the ARARs listed in the RSOP.</b>			<input type="checkbox"/> Yes, attach to letter.
			<input checked="" type="checkbox"/> No
<b>Attach Administrative Record file requirements for the activity.</b>			
<b>Point of contact for each facility/activity:</b> Karen Wiemelt – (303) 966-9883			
<b>Duration of work activities:</b> 4 months		<b>Anticipated work start:</b> 10/10/02	
<b>Attach schedule for each facility or activity for information purposes.</b>			
<b>Does the activity involve removing contaminated portions of the building shell.</b>			<input type="checkbox"/> Yes, LRA consultation and concurrence required
			<input checked="" type="checkbox"/> No

<sup>1</sup> Evaluate using DPP, Sections 1.1.4 and 1.1.5 and the consultative process to implement activities

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# RSOP for Component Removal, Size Reduction, and Decontamination Activities Checklist

Attachment 1  
FEG-019-02  
Page 3 of 7

Are there deviations/exceptions to the RSOP for the proposed activity(ies)?										<input type="checkbox"/>	Yes
										<input checked="" type="checkbox"/>	No
Provide an explanation of deviation/exception to the RSOP: Not applicable											
C. Check the appropriate resulting action box below											
Additional RFCA decision document required (PAM – IM/IRA)											
Major modification to RSOP						Field change to RSOP					
Minor modification to RSOP						LRA consultation					
Activity(ies) will result in the following waste types										<input type="checkbox"/>	Process waste
										<input checked="" type="checkbox"/>	Remediation waste
<input type="checkbox"/>	TRU	<input checked="" type="checkbox"/>	LLW	<input type="checkbox"/>	LLMW	<input type="checkbox"/>	Haz.	<input checked="" type="checkbox"/>	Sanitary	<input checked="" type="checkbox"/>	Other: recycle/re-use
LRA Notification Review Time				<input checked="" type="checkbox"/>	14 days, no RCRA unit closure involved						
				<input type="checkbox"/>	30 days, RCRA unit closure involved						

**FACILITY COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION  
ACTIVITY CHECKLIST**

Building: 910

Closure Project Manager: Karen Wiemelt

**COMPONENT REMOVAL/SIZE REDUCTION**

Component Type(s)	
Gloveboxes	
Tanks and ancillary equipment (located both inside and outside the facility)	✓
Fume hoods	
Ventilation/filtration systems (both inside and outside the facility)	✓
Utilities and other equipment (both inside and outside the facility; including electrical, steam, and fire suppression systems)	✓
Walls	
Floors	
Ceilings	
Roofs	
Other structural members	
Other*	

Removal/Size Reduction Technique(s)	
Small tools	✓
Paving breaker, jackhammer and/or similar tools used to break up concrete	
Excavators, such as backhoes, to excavate underground components, such as tanks and ancillary equipment	
Hoists and cranes	✓
Plasma arc cutter	
Diamond wire saw	
Wachs cutter	
Laser cutter	
Oxy-torch cutter	
Hydraulic shears	
Shear baler	
Water cutter using abrasives	
Arc air slice	
Arbor press	
Non-explosive cracking agent	
Other *	

\* Describe "Other" Component Type(s) and/or Removal/Size Reduction Technique(s):

**FACILITY COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION  
ACTIVITY CHECKLIST**

**DECONTAMINATION**

Component(s)	✓
Gloveboxes	
Tanks and ancillary equipment (located both inside and outside the facility)	✓
Fume hoods	
Ventilation/filtration systems (both inside and outside the facility)	
Utilities and other equipment (both inside and outside the facility; including electrical, steam, and fire suppression systems)	✓
Walls	
Floors	
Ceilings	
Roofs	
Other structural members	
Other*	

Decontamination Technique(s)	✓
Wiping/scrubbing/washing with water or detergents	✓
Vacuuming	✓
Strippable Coating	
Grinding	
Scarifying	
Scabbling	
Paving breaker/chipping hammer	
Spalling	
Abrasive/grit blasting	
CO <sub>2</sub> blasting	
Hydrolasing	
Strong mineral acids	
Organic or weak acids	
Additional oxidants, such as cerium and other similar metals	
Other *	

\* Describe "Other" Component(s) and/or Decontamination Technique(s):

**Note:** In the event a planned activity falls outside the scope of this RSOP, the closure project manager will consult with DOE and the LRA to determine whether this RSOP should be modified to include the activity, or whether a separate decision document should be written.

Prepared by: Karen Wiemelt

Date: 08/06/02

## A Brief History of the Regulatory Status of Building 910

The imminent removal of Building 910 has prompted reflection on the regulatory status of the building and its contents. There have been several historical summaries (Ward, 2002; Fiehweg, 1998) that reviewed the events in the early 1990s surrounding the incorporation of B910 into the closure scheme for the Solar Evaporation Ponds, Operable Unit 4. Prior to 1992, B910 contained reverse osmosis equipment that had been permitted as an outfall (Outfall 004) in the Rocky Flat's National Pollutant Discharge Elimination System (NPDES) permit (in 1991, EPA recognized that the B910 outfall was inactive, but it wasn't until October 2000 that this outfall was officially removed from the NPDES permit).

In the early 1990s, the reverse osmosis equipment was removed from B910 and the building retrofitted with evaporation equipment, similar to that in Building 374, for the purpose of treating wastewater from the solar ponds. This work was done under the first Interim Measures/Interim Remediation Action (IM/IRA) Decision Document for OU4 (April 1992). At the same time, water collected from the Interceptor Trench System (ITS), which had formerly been pumped into the solar ponds, was segregated from the system and directed into the modular storage tanks (MSTs), also constructed under the IM/IRA. The State of Colorado stated in several documents related to OU4 and B910 that the intent was to permit this unit under the Rocky Flats Part B Resource Conservation and Recovery Act (RCRA) permit. The permit modification that would provide permit authority over B910 was to be the final approved IM/IRA for OU4.

All actions identified in the IM/IRA were taken up to and including pumping water from the MSTs for treatment in B910. After 300,000 gallons of ITS water had been sent to B910, the operational problems were deemed insurmountable, and in 1993 EPA approved treating the ITS water in B374 in lieu of B910. B910 was never to run again.

Meanwhile, the ITS water, an environmental media potentially containing hazardous waste, was managed as if it were a hazardous waste in accordance with state guidance. The 1992 IM/IRA contained a compilation of water quality data for ITS water collected from 1988 to 1991, showing that the primary contaminants were uranium and nitrate, which are not hazardous constituents. The MSTs were identified as RCRA Units in accordance with the guidance and in anticipation of an approved permit modification. The guidance also requires the generator to fully characterize the components in the environmental media, and allows for a determination that the material is not a hazardous waste if the characterization meets the state's criteria. Using the above-referenced data for ITS water quality, a Human Health Risk Assessment (1996) concluded that the ITS water was not hazardous.

At the same time the ITS water was shown to be non-hazardous, a new clean up agreement ended the process of including B910 in the RCRA permit. The Rocky Flats Clean Up Agreement (RFCA) halted action in a number of operable units, including OU4. The draft final IM/IRA was declared the end point for the solar ponds, and, as a result, the proposed RCRA permit modification was never approved.

Therefore, B910 does not have any RCRA closure requirements because the building was never formally included in an approved permit modification, and there are no RCRA waste issues attached to the MSTs or ITS water because it was conclusively demonstrated that the ground water was an environmental media not contaminated with hazardous wastes in accordance with state guidance. The fact that the ITS water was managed as a hazardous waste, as required by the state's guidance, until the characterization does not confer any hazardous waste status to the water. The treatment processes in B910 did include the use of such materials as acids, which, if they become waste, would be characteristically hazardous. However, if there are such wastes, they would be managed under the existing permit and Site requirements.

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**FACILITY COMPONENT REMOVAL, SIZE REDUCTION, AND DECONTAMINATION  
ACTIVITY CHECKLIST**

- Final Rocky Flats Cleanup Agreement (RFCA)
- RFETS Decommissioning Program Plan (DPP)
- RFCA Standard Operating Protocol for Component Removal, Size Reduction, and Decontamination Activities
- Reconnaissance Level Characterization Report for Group A Facilities
- Notification Letter and subsequent CDPHE correspondence, if appropriate

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